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Attorneys for Defendant Bank of America, N.A.

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

**KRISTYN DAWSON**, an individual,

Plaintiff,

v.

**BANK OF NEW YORK MELLON**, a Delaware corporation; and **BANK OF AMERICA, N.A.** and its subsidiaries including aka Bank of America Loan Servicing, LP, Countrywide Financial Corporation, and Countrywide Home Loans, Inc.; **DITECH FINANCIAL, LLC** as successor by merger to Green Tree Servicing LLC,

Defendants.

Case No. 3:16-cv-01427-HZ

**DEFENDANT BANK OF AMERICA, N.A.'S UNOPPOSED MOTION TO EXTEND DEADLINE ALL UPCOMING DEADLINES**

**LOCAL RULE 7-1 CERTIFICATION**

Counsel for defendant Bank of America, N.A. certifies that he conferred with counsel for Plaintiff and counsel for defendants The Bank of New York Mellon and Ditech Financial, LLC regarding the instant Motion and both agree with the instant Motion.

**MOTION**

Defendant Bank of America, N.A., respectfully moves for an order extending all upcoming deadlines ninety days (90) after the ruling on defendant Bank of America, N.A.'s motion to dismiss. This Motion is supported by the Declaration of James P. Laurick filed herewith.

The parties have conferred and agree it would be more efficient to engage in discovery after this Court has ruled on defendant Bank of America, N.A.'s motion to dismiss.

DATED: November 21, 2016.

KILMER VOORHEES & LAURICK, P.C.

*/s/ James P. Laurick*  
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Of Attorneys for Defendant Bank of America, N.A.

**CERTIFICATE OF SERVICE**

I certify that on this 21<sup>st</sup> day of November, 2016, the foregoing **DEFENDANT BANK OF AMERICA, N.A.'S UNOPPOSED MOTION TO EXTEND DEADLINE ALL UPCOMING DEADLINES** will be served in accordance with the Court's CM/ECF system which will send notification of such filing by notice via email to the ECF participants of record a true copy of the foregoing document.

KILMER VOORHEES & LAURICK, P.C.

*/s/ James P. Laurick*  
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